

# Exhibit 8

## RE: Deposition of Solo Administrator

Oxford, Neil <neil.oxford@hugheshubbard.com>

Thu 7/21/2022 1:53 PM

To:Sharon McCarthy <smccarthy@kflaw.com>; 'Schoenfeld, Alan E' <Alan.Schoenfeld@wilmerhale.com>;  
Cc:'Dulberg, Andrew S.' <Andrew.Dulberg@wilmerhale.com>; Nicholas Bahnsen <nbahnsen@kflaw.com>; 'Lichtenstein, Julia P'  
<Julia.Lichtenstein@wilmerhale.com>; 'Kari Parks' <kparks@gusraekaplan.com>; 'John Hanamirian' <jmh@hanamirian.com>; Smith,  
Dustin <dustin.smith@hugheshubbard.com>; Harbus, Carolyn <Carolyn.harbus@hugheshubbard.com>; Caroline Ciraolo  
<cciraolo@kflaw.com>; Weinstein, Marc A. <marc.weinstein@hugheshubbard.com>;

Dear Sharon and Alan,

I write to notify you of the examination of Nigel Rackham, Special Administrator of Solo Capital Partners LLP, pursuant to the July 8, 2021 Order issued in *Skatteforvaltningen (The Danish Customs and Tax Administration) v Avanix Management LLC & Others* [2021] EWHC QF 2021-007459 (QB) is scheduled for September 1, 2022, 7am EDT.

Best,

Neil

Neil Oxford | Partner

Hughes Hubbard & Reed LLP

[One Battery Park Plaza, 16th floor | New York | NY 10004-1482](#)

Office +1 (212) 837-6843 | Cell +1 (646) 709-1424 | Fax +1 (212) 299-6843

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**From:** Oxford, Neil

**Sent:** Sunday, January 9, 2022 7:30 PM

**To:** Sharon McCarthy <smccarthy@kflaw.com>

**Cc:** Schoenfeld, Alan E <Alan.Schoenfeld@wilmerhale.com>; Dulberg, Andrew S. <Andrew.Dulberg@wilmerhale.com>;  
Nicholas Bahnsen <nbahnsen@kflaw.com>; Lichtenstein, Julia P <Julia.Lichtenstein@wilmerhale.com>; Kari Parks  
<kparks@gusraekaplan.com>; John Hanamirian <jmh@hanamirian.com>; Smith, Dustin  
<dustin.smith@hugheshubbard.com>; Harbus, Carolyn <Carolyn.harbus@hugheshubbard.com>; Caroline Ciraolo  
<cciraolo@kflaw.com>; Weinstein, Marc A. <marc.weinstein@hugheshubbard.com>

**Subject:** RE: Deposition of Solo Administrator

Dear Sharon,

The Administrators have postponed the examination that was set for January 13. We are seeking a new date in February and will advise accordingly.

Best,

Neil

---

**From:** Oxford, Neil

**Sent:** Monday, December 20, 2021 3:02 PM

**To:** Sharon McCarthy <smccarthy@kflaw.com>

**Cc:** Schoenfeld, Alan E <Alan.Schoenfeld@wilmerhale.com>; Dulberg, Andrew S. <Andrew.Dulberg@wilmerhale.com>; Nicholas Bahnsen <nbahnsen@kflaw.com>; Lichtenstein, Julia P <Julia.Lichtenstein@wilmerhale.com>; Kari Parks <kparks@gusraekaplan.com>; John Hanamirian <jmh@hanamirian.com>; Smith, Dustin <dustin.smith@hugheshubbard.com>; Harbus, Carolyn <Carolyn.harbus@hugheshubbard.com>; Caroline Ciraolo <cciraolo@kflaw.com>; Weinstein, Marc A. <marc.weinstein@hugheshubbard.com>

**Subject:** Re: Deposition of Solo Administrator

Dear Sharon,

I have now confirmed there are no restrictions; either category below may attend.

The examination has now been rescheduled for January 13th, 7am. Please let Carolyn Harbus, cc'd here, know two days in advance who from your side plans on attending.

Best,

Neil

On Dec 17, 2021, at 2:50 PM, Sharon McCarthy <smccarthy@kflaw.com> wrote:

**CAUTION: This email was sent by someone outside of the Firm.**

Dear Neil,

Can you please confirm that attendance at the deposition of the Solo Administrator is not restricted and that any attorneys involved in the MDL are permitted to attend? Please also confirm that MDL defendants are permitted to attend.

Thank you.

Sharon L. McCarthy (she/her/hers)  
Kostelanetz & Fink, LLP  
7 World Trade Center, 34th Floor  
New York, New York 10007  
(347) 613-0829 (Cell)  
(212) 840-6866 (Office)  
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**From:** Oxford, Neil <neil.oxford@hugheshubbard.com>

**Sent:** Thursday, December 9, 2021 2:01 PM

**To:** Sharon McCarthy <smccarthy@kflaw.com>

**Cc:** Schoenfeld, Alan E <Alan.Schoenfeld@wilmerhale.com>; Dulberg, Andrew S. <Andrew.Dulberg@wilmerhale.com>; Nicholas Bahnsen <nbahnsen@kflaw.com>; Lichtenstein, Julia P <Julia.Lichtenstein@wilmerhale.com>; Kari Parks <kparks@gusraekaplan.com>; John Hanamirian <jmh@hanamirian.com>; Smith, Dustin <dustin.smith@hugheshubbard.com>; Harbus, Carolyn <Carolyn.harbus@hugheshubbard.com>; Caroline Ciraolo <cciraolo@kflaw.com>; Weinstein, Marc A. <marc.weinstein@hugheshubbard.com>

**Subject:** Re: Deposition of Solo Administrator

Hi Sharon,

We do not, because you didn't withdraw your objection.

Best,

Neil

**Neil Oxford** | Partner

**Hughes Hubbard & Reed LLP**

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On Dec 9, 2021, at 1:52 PM, Sharon McCarthy <[smccarthy@kflaw.com](mailto:smccarthy@kflaw.com)> wrote:

**CAUTION: This email was sent by someone outside of the Firm.**

Hi, Neil,

Please let us know if you intend to proceed with the deposition tomorrow.

Thank you.

Sharon L. McCarthy (she/her/hers)  
Kostelanetz & Fink, LLP  
7 World Trade Center, 34th Floor  
New York, New York 10007  
(347) 613-0829 (Cell)  
(212) 840-6866 (Office)  
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---

**From:** Sharon McCarthy  
**Sent:** Thursday, December 9, 2021 9:43 AM  
**To:** 'Oxford, Neil' <[neil.oxford@hugheshubbard.com](mailto:neil.oxford@hugheshubbard.com)>  
**Cc:** Schoenfeld, Alan E <[Alan.Schoenfeld@wilmerhale.com](mailto:Alan.Schoenfeld@wilmerhale.com)>; Dulberg, Andrew S. <[Andrew.Dulberg@wilmerhale.com](mailto:Andrew.Dulberg@wilmerhale.com)>; Nicholas Bahnsen <[nbahnsen@kflaw.com](mailto:nbahnsen@kflaw.com)>; Lichtenstein, Julia P <[Julia.Lichtenstein@wilmerhale.com](mailto:Julia.Lichtenstein@wilmerhale.com)>; Kari Parks <[kparks@gusraekaplan.com](mailto:kparks@gusraekaplan.com)>; John Hanamirian <[jmh@hanamirian.com](mailto:jmh@hanamirian.com)>; Smith, Dustin <[dustin.smith@hugheshubbard.com](mailto:dustin.smith@hugheshubbard.com)>; Harbus, Carolyn <[Carolyn.harbus@hugheshubbard.com](mailto:Carolyn.harbus@hugheshubbard.com)>; Caroline Ciraolo <[cciraolo@kflaw.com](mailto:cciraolo@kflaw.com)>; Weinstein, Marc A. <[marc.weinstein@hugheshubbard.com](mailto:marc.weinstein@hugheshubbard.com)>  
**Subject:** RE: Deposition of Solo Administrator

Dear Neil,

We do not withdraw our objection to SKAT's failure to comply with the order authorizing the deposition of the Solo Administrator. We agree that we should not do this deposition twice, so it should be postponed. We are amenable to finding a mutually agreeable date in January.

Regards,

Sharon L. McCarthy (she/her/hers)  
 Kostelanetz & Fink, LLP  
 7 World Trade Center, 34th Floor  
 New York, New York 10007  
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---

**From:** Oxford, Neil <[neil.oxford@hugheshubbard.com](mailto:neil.oxford@hugheshubbard.com)>  
**Sent:** Thursday, December 9, 2021 8:58 AM  
**To:** Sharon McCarthy <[smccarthy@kflaw.com](mailto:smccarthy@kflaw.com)>  
**Cc:** Schoenfeld, Alan E <[Alan.Schoenfeld@wilmerhale.com](mailto:Alan.Schoenfeld@wilmerhale.com)>; Dulberg, Andrew S. <[Andrew.Dulberg@wilmerhale.com](mailto:Andrew.Dulberg@wilmerhale.com)>;  
 Nicholas Bahnsen <[nbahnsen@kflaw.com](mailto:nbahnsen@kflaw.com)>; Lichtenstein, Julia P <[Julia.Lichtenstein@wilmerhale.com](mailto:Julia.Lichtenstein@wilmerhale.com)>; Kari Parks  
 <[kparks@gusraekaplan.com](mailto:kparks@gusraekaplan.com)>; John Hanamirian <[jmh@hanamirian.com](mailto:jmh@hanamirian.com)>; Smith, Dustin  
 <[dustin.smith@hugheshubbard.com](mailto:dustin.smith@hugheshubbard.com)>; Harbus, Carolyn <[Carolyn.harbus@hugheshubbard.com](mailto:Carolyn.harbus@hugheshubbard.com)>; Caroline Ciraolo  
 <[cciraolo@kflaw.com](mailto:cciraolo@kflaw.com)>; Weinstein, Marc A. <[marc.weinstein@hugheshubbard.com](mailto:marc.weinstein@hugheshubbard.com)>  
**Subject:** RE: Deposition of Solo Administrator

Dear Sharon,

Following up on our call yesterday, please advise by 10am today whether the Defendants withdraw their objections to proceeding with the examination of the Administrator tomorrow morning. We do not think it is a good use of anyone's

resources to do this twice, so will not proceed tomorrow if Defendants intend to maintain their objections.

The 10 am deadline is to give as much notice as possible to those involved in England, including the Examiner, who as you are aware have been preparing to proceed tomorrow. If we do not hear from you by 10 am, we will postpone the examination and seek a date in January.

Best,

Neil

**Neil Oxford** | Partner

**Hughes Hubbard & Reed LLP**

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---

**From:** Oxford, Neil

**Sent:** Wednesday, December 8, 2021 3:35 PM

**To:** Sharon McCarthy <[smccarthy@kflaw.com](mailto:smccarthy@kflaw.com)>

**Cc:** Schoenfeld, Alan E <[Alan.Schoenfeld@wilmerhale.com](mailto:Alan.Schoenfeld@wilmerhale.com)>; Dulberg, Andrew S. <[Andrew.Dulberg@wilmerhale.com](mailto:Andrew.Dulberg@wilmerhale.com)>; Nicholas Bahnsen <[nbahnsen@kflaw.com](mailto:nbahnsen@kflaw.com)>; Lichtenstein, Julia P <[Julia.Lichtenstein@wilmerhale.com](mailto:Julia.Lichtenstein@wilmerhale.com)>; Kari Parks <[kparks@gusraekaplan.com](mailto:kparks@gusraekaplan.com)>; John Hanamirian <[jmh@hanamirian.com](mailto:jmh@hanamirian.com)>; Smith, Dustin <[dustin.smith@hugheshubbard.com](mailto:dustin.smith@hugheshubbard.com)>; Harbus, Carolyn <[Carolyn.harbus@hugheshubbard.com](mailto:Carolyn.harbus@hugheshubbard.com)>; Caroline Ciraolo <[cciraolo@kflaw.com](mailto:cciraolo@kflaw.com)>; Weinstein, Marc A. <[marc.weinstein@hugheshubbard.com](mailto:marc.weinstein@hugheshubbard.com)>

**Subject:** RE: Deposition of Solo Administrator

Dear Sharon,

This was not a document dump. SKAT only just received these documents from the Solo Administrators, and produced them to the Defendants as promptly as possible.

Are you available this afternoon for a call to try to resolve your objections?

Best,

Neil

---

**From:** Sharon McCarthy <[smccarthy@kflaw.com](mailto:smccarthy@kflaw.com)>

**Sent:** Wednesday, December 8, 2021 11:46 AM

**To:** Oxford, Neil <[neil.oxford@hugheshubbard.com](mailto:neil.oxford@hugheshubbard.com)>

**Cc:** Schoenfeld, Alan E <[Alan.Schoenfeld@wilmerhale.com](mailto:Alan.Schoenfeld@wilmerhale.com)>; Dulberg, Andrew S. <[Andrew.Dulberg@wilmerhale.com](mailto:Andrew.Dulberg@wilmerhale.com)>; Nicholas Bahnsen <[nbahnsen@kflaw.com](mailto:nbahnsen@kflaw.com)>; Lichtenstein, Julia P <[Julia.Lichtenstein@wilmerhale.com](mailto:Julia.Lichtenstein@wilmerhale.com)>; Kari Parks <[kparks@gusraekaplan.com](mailto:kparks@gusraekaplan.com)>; John Hanamirian <[jmh@hanamirian.com](mailto:jmh@hanamirian.com)>; Smith, Dustin <[dustin.smith@hugheshubbard.com](mailto:dustin.smith@hugheshubbard.com)>; Harbus, Carolyn <[Carolyn.harbus@hugheshubbard.com](mailto:Carolyn.harbus@hugheshubbard.com)>; Caroline Ciraolo <[cciraolo@kflaw.com](mailto:cciraolo@kflaw.com)>

<[cciraolo@kflaw.com](mailto:cciraolo@kflaw.com)>; Weinstein, Marc A. <[marc.weinstein@hugheshubbard.com](mailto:marc.weinstein@hugheshubbard.com)>

**Subject:** Deposition of Solo Administrator

**CAUTION: This email was sent by someone outside of the Firm.**

Dear Neil,

Now that we've been able to download the over 62,000 pages from the Solo Administrator that you produced to us late Friday evening, it is clear to us that you have failed to comply with paragraph 8(h) of the High Court of Justice's order, which requires that, at least 7 days before the examination, you provide to us "a paginated bundle containing copies of any documents intended to be referred to during the Examination." We do not consider the Friday evening document dump to comply with that specific aspect of the order.

We therefore object to the examination of Nigel Rackham proceeding on December 10<sup>th</sup> and demand that you produce to us the "paginated bundle" described in the court's order at least 7 days before any such examination.

In addition, since the examination is not to exceed 7 hours, please tell us how much time you will need for your examination so that we can be certain that there will be sufficient time for cross-examination.

Regards,

Sharon L. McCarthy (she/her/hers)

Kostelanetz & Fink, LLP

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